

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICAN INTERNATIONAL GROUP,)	
INC., et al.,)	
)	
Plaintiffs,)	No. 07 CV 2898
vs.)	
)	District Judge Robert W. Gettleman
ACE INA HOLDINGS, INC., et al.,)	
)	Magistrate Judge Sidney I. Schenkier
Defendants.)	

SAFECO INSURANCE COMPANY OF)	
AMERICA, et al., individually and on behalf)	
of a class consisting of members of the)	
National Workers Compensation Reinsurance)	No. 09 CV 2026
Pool,)	
)	District Judge Robert W. Gettleman
Plaintiffs,)	
vs.)	Magistrate Judge Sidney I. Schenkier
)	
AMERICAN INTERNATIONAL GROUP,)	
INC., et al.,)	
)	
Defendants.)	

NOTICE OF FILING

TO: All Parties of Record (ECF Filing)

PLEASE TAKE NOTICE that on December 5, 2011, we filed with the United States District Court for the Northern District of Illinois the Demonstrative Exhibits which the Settlement Class Plaintiffs tendered to the Court in connection with the hearing of November 29, 2011.

DATED: December 5, 2011

Respectfully submitted,

ACE INA HOLDINGS, INC., AUTO-
OWNERS INSURANCE CO., COMPANION
PROPERTY & CASUALTY INS. CO.,
FIRSTCOMP INSURANCE CO., THE
HARTFORD FINANCIAL SERVICES
GROUP, INC., TECHNOLOGY
INSURANCE CO., and THE TRAVELERS
INDEMNITY COMPANY

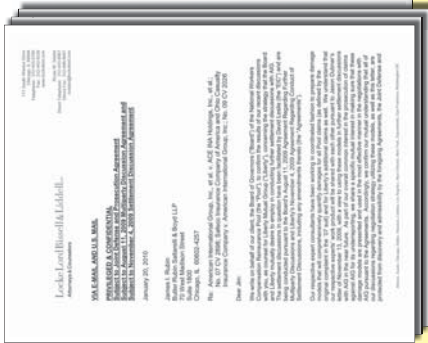
By /s/ Frederic R. Klein
One of Their Attorneys

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Chicago, IL 60603
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**Index of Settlement Class Plaintiffs' Demonstrative Exhibits for November 29, 2011
Final Fairness Hearing**

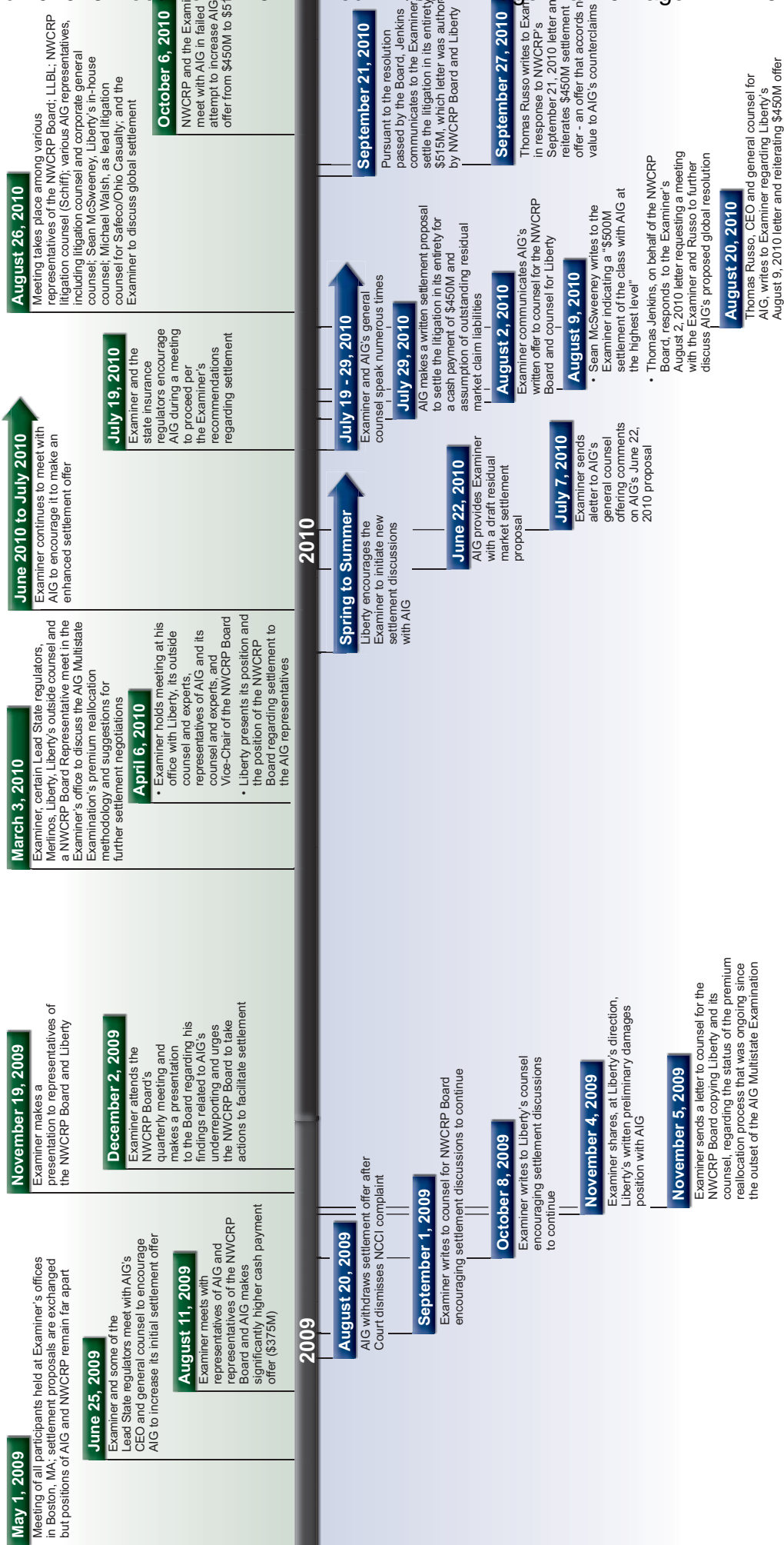
1. January 20, 2010 Agreement Between NWCRP Board And Liberty Regarding Limits on Negotiating Authority
2. Chronology of Examiner's Role in Procuring \$450M Settlement Offer
3. Liberty's Misconduct
4. After Expiration of Objection/Opt-out Period: Support for and Objections to \$450 Million Settlement Fund
5. 1% Allocation Chart
6. Summary of Objectors' Position On The Adequacy of Settlement Class Plaintiffs

January 20, 2010 Agreement Between NWCRP Board And Liberty Regarding Limits On Negotiating Authority



2. Liberty shall promptly advise the Board's outside counsel of any meetings scheduled with AIG and/or David Leslie. Prior to such meetings, Liberty will meet and confer with the Board's representatives to discuss the settlement strategy for such meetings, so that an understanding can be reached as to the settlement strategy to be employed, including disclosure of the opening offers to be made in each session...
 4. A Board representative, specifically a company representative from the Settlement Committee, may, in the Board's discretion, attend any meetings with AIG to observe the discussions...
 8. Liberty's authority to speak on behalf of the Board will terminate the earliest of the following events:
 - a. February 26, 2010, unless extended; or
 - b. 24 hours notice from counsel for the Board to counsel for Liberty (in writing or by email)...
- R. 519-1, Settlement Class Plaintiffs' Memorandum of Law in Opposition to Objectors' Motions for Fees and Costs, Exhibit C, Third Supplemental Declaration of Rowe W. Snider, Exhibit A*

Chronology Of Examiner's Role In Procuring \$450M Settlement Offer



Liberty's Misconduct

May 8, 2010

Liberty attends unauthorized meeting with AIG in breach of January 20, 2010 letter agreement with the NWCRP Board

August 9, 2010

Liberty letter states that it would block a global settlement between AIG and the class for \$500 million unless Liberty got a separate significant payment for its non-class claims

September 14, 2010

Liberty threatens to sue the NWCRP Board members if they tried to negotiate a class settlement with AIG without Liberty's approval

September 15, 2010

Liberty states during a NWCRP Board meeting that a class settlement of \$450 million was reasonable and would be supported by Liberty only if Liberty got a substantial separate payment for its non-Pool claims

January 13, 2011

Liberty threatens to sue the other AURs

February 14, 2011

Liberty's General Counsel sends 51 letters to 51 insurance commissioners "urging" them to instruct their agent, David Leslie, not to provide an affidavit in the Chicago residual market litigation

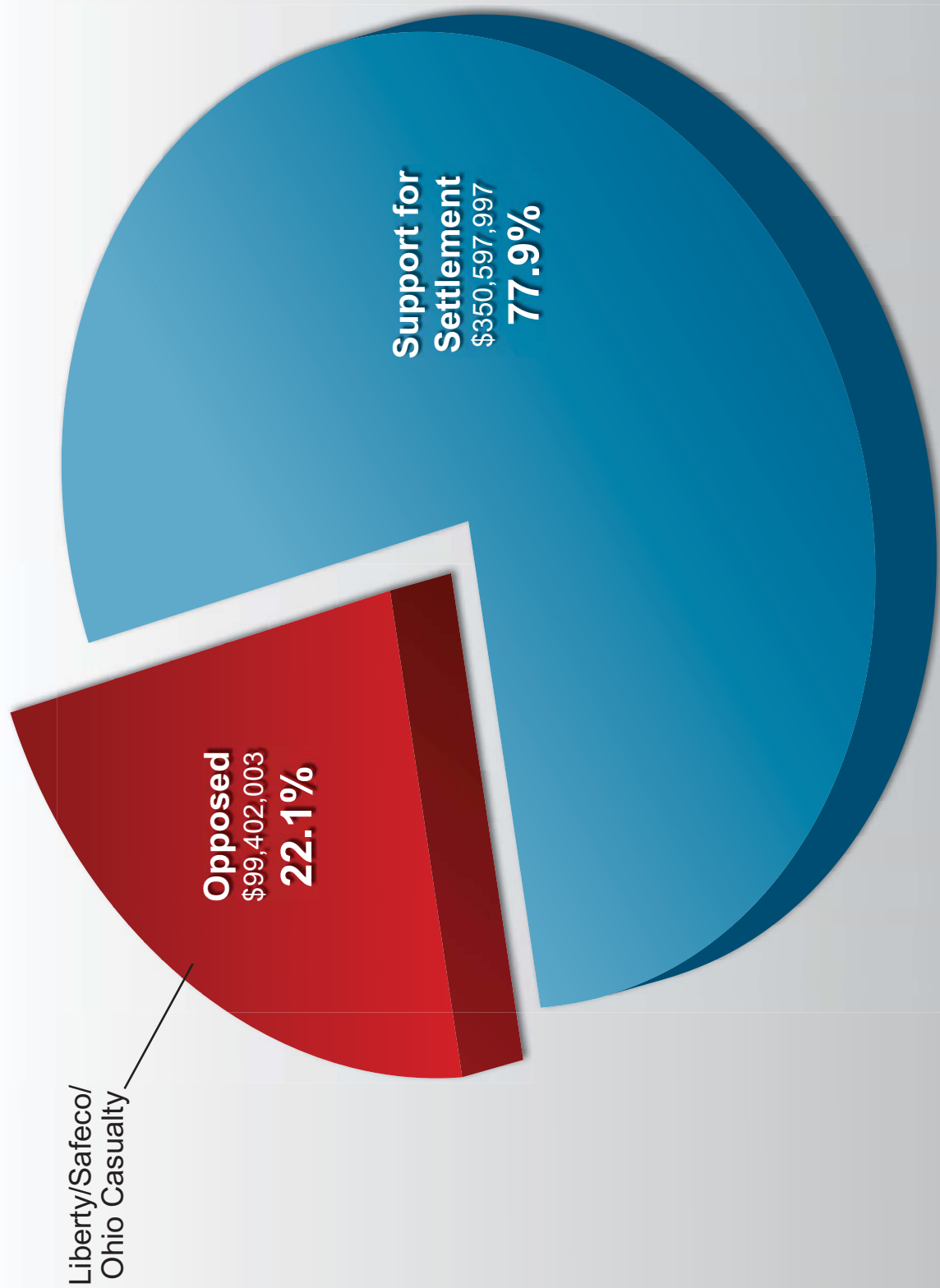
August 18, 2011

Liberty goes live with a website actually approved by the Court only for Safeco and Ohio Casualty in which Liberty urges class members to opt out or object

October 3, 2011

Despite urging class members to opt out, in which case they would receive no proceeds from the Plan of Allocation, Liberty objects to preserve its rights to receive \$99 million

After Expiration Of Objection/Opt-out Period: Support For And Objections To \$450 Million Settlement Fund



Liberty/Safeco/
Ohio Casualty

Lumbermens Objection: No amount under the Plan of Allocation
RLI Opt-out: \$458 under the Plan of Allocation

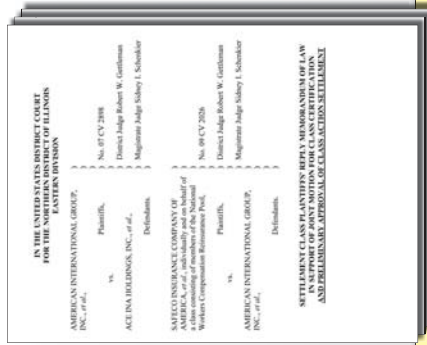
1% Allocation Chart*

Group Name	Cash Distribution
Continental Casualty Co. (CNA)	\$49,889,408.92
Zurich American Insurance Co.	\$25,967,097.76
Firemen's Fund Insurance Co.	\$9,802,780.52
Arrowood Insurance Co. (Royal Ins Co. of America)	\$9,683,473.87
Nationwide Mutual Insurance Co.	\$8,386,722.12
OneBeacon Insurance Co.	\$8,332,857.56
Old Republic Insurance Co.	\$7,998,727.98
Crum and Forster Insurance Co.	\$7,754,131.91
State Farm Fire and Casualty Co.	\$6,494,117.87
Electric Insurance Co.	\$6,303,935.60
Sentry Insurance Mutual Co.	\$5,302,994.85

*Does not include Settlement Class Plaintiffs

\$145,916,248.96

Summary Of Objectors' Position On The Adequacy Of Settlement Class Plaintiffs



The Objectors' attack on the adequacy of the Settlement Class Plaintiffs boils down to this: if any company does not adopt the Objectors' position in the litigation, those companies are conflicted, their counsel are conflicted, and/or they lack the sophistication, knowledge, diligence, and integrity to reach a reasoned decision regarding the adequacy of a settlement...

R. 386, Settlement Class Plaintiffs' Reply Memorandum of Law in Support of Joint Motion for Class Certification and Preliminary Approval of Class Action Settlement, p. 44

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on December 5, 2011, he caused a true and correct copy of the Demonstrative Exhibits which the Settlement Class Plaintiffs tendered to the Court in connection with the hearing of November 29, 2011 to be served upon the parties of record via the Court's ECF/electronic mailing system.

/s/ Frederic R. Klein